

**IN THE UNITED STATES DISTRICT COURT  
FOR NEW JERSEY – TRENTON VICINAGE**

<b>WILLIAM COLEMAN</b>	:	<b>NO: 3:10-cv-02613</b>
	:	
	:	<b>MLC-TJB</b>
<b>v.</b>	:	
	:	
<b>RAMON CAMACHO, TRACY POLK,</b>	:	
<b>TODD COLEMAN, STANLEY BAUMER</b>	:	
<b>RAMON CHAPPARD, JEFFREY GRIPPALDI,</b>	:	
<b>ROBERT SHAMROCK AND JEFFREY PILONE:</b>	:	
<b>and JASON ROEBUCK</b>	:	
	:	

**POSITION MEMORANDUM OF DEFENDANTS ON DISCOVERY AND TRIAL**

Defendants Ramon Camacho, Tracy Polk, Todd Coleman, Stanley Baumer, Ramon Chappard, Jeffrey Grippaldi, Robert Shamrock and Jeffrey Pilone, by and through their undersigned counsel, hereby submit their Memorandum as to their position on discovery and trial in the above matter.

**I. STATUS OF DISCOVERY**

The above-named Defendants have not engaged in any discovery in this matter, as they were initially unaware that this action was pending. Since these Defendants have had counsel enter on their behalf, they have been involved in motion practice. Defendants would therefore respectfully request the opportunity to engage in discovery in the form of written discovery requests, subpoenas for Plaintiff's medical records and prison file, and taking of Plaintiff's deposition. Defendants would work quickly to get this accomplished, but due to Plaintiff's incarceration, would request at least ninety (90) days for discovery. Defendants also intend to engage a liability expert.

**II. POSITION ON TRIAL READINESS**

Defendants would request leave to file a dispositive motion after the close of discovery.

### III. REQUEST FOR DATE CERTAIN

Given the amount of Defendant officers in this matter, Defendants respectfully request that if this case is listed for trial, it be given a date certain. Some of the Defendants no longer work for the City of Long Branch, so they will need to give advance notice to their current employers.

WILLIAM J. FERREN & ASSOCIATES

BY: /s/ Paola F. Kaczynski, Esquire  
Paola F. Kaczynski, Esquire  
Attorney for Defendants  
Ramon Camacho, Tracy Polk, Todd Coleman,  
Stanley Baumer, Ramon Chappard, Jeffrey  
Grippaldi, Robert Shamrock and Jeffery Pilone  
1500 Market Street – Suite 2920  
Philadelphia, PA 19102  
267-675-3009

Date: March 30, 2016

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<b>RAMON CHAPPARD, JEFFREY GRIPPALDI,</b>	<b>:</b>
<b>ROBERT SHAMROCK AND JEFFREY PILONE</b>	<b>: CERTIFICATION</b>
<b>and JASON ROEBUCK</b>	<b>: OF SERVICE</b>

I, Paola Tripodi Kaczynski do hereby certify that a true and correct copy of the within Memorandum of Defendants was filed electronically with the Court and a copy was sent to Plaintiff (pro se) and to Co-Defense counsel via e-filing and/or United States mail, postage prepaid on March 30, 2016

**William Coleman - #18598  
c/o Monmouth County Correctional Institution  
1 Waterworks Road  
Freehold, NJ 07728**

**James John Uliano, Esquire  
Chamlin Rosen and Uliano & Worthington  
268 Norwood Avenue  
Post Office Box 38  
West Long Branch, NJ 07764**

**WILLIAM J. FERREN & ASSOCIATES**

BY: /s/Paola Tripodi Kaczynski  
Attorney for Defendants  
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